

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLAN BARREDA, and all other Plaintiffs)
similarly situated known and unknown,)
Plaintiffs,) CIVIL ACTION
v.) File No. 1:08-cv-3239
PROSPECT AIRPORT SERVICES, INC.,) Hon. Judge Kennelly
Defendant.)

MOTION TO ENLARGE TIME

Defendant, PROSPECT AIRPORT SERVICES, INC. ("Prospect"), pursuant to Fed. R. Civ. P. 6(b), for an enlargement of time from June 26, 2008 to July 28, 2008, to respond to the Complaint filed by Plaintiff, ALLAN BARREDA ("Plaintiff"). In support thereof, Prospect states as follows:

1. Plaintiff filed its Complaint on or about June 4, 2008, and served it on or around June 6, 2008.
2. Prospect's Answer is currently due to be filed on June 26, 2008.
3. The Complaint raises various claims under the Fair Labor Standards Act, 29 U.S.C. §201, *et. seq.* and various state statutes. The Complaint also purports to raise claims on behalf of similarly situated known and unknown plaintiffs.
4. Due to the nature of the claims raised, Prospect requires additional time to prepare and file its response to the Complaint. Prospect is requesting an extension to July 28, 2008.
5. This is Prospect's first request for an extension of time in which to respond to the Complaint. Prospect contacted counsel for Plaintiff, who stated his objection to a thirty-day

extension. This motion is being brought in good faith and not for the purpose of undue delay.

WHEREFORE, Defendant, PROSPECT AIRPORT SERVICES, INC., requests that the Court grant the Motion to Enlarge Time, enlarge the time to respond to the Complaint to July 28, 2008, and grant such other relief as the Court deems just.

Respectfully Submitted,
PROSPECT AIRPORT SERVICES, INC

BY: /s/: Lauren Blair
One of its attorneys

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